



December 10, 2020

Reference No. 11208393-111

Mr. Robert Thompson
Remedial Project Manager
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Mail Code SR-6J
Chicago, Illinois
60604

Ms. Tamara McPeck
Environmental Response and Revitalization
Ohio Environmental Protection Agency
Southwest District Office
401 East Fifth Street
Dayton, Ohio
45402

Mr. Steve Renninger
On-Scene Coordinator
United States Environmental Protection Agency
Region V
Emergency Response Branch
26 West Martin Luther King Drive
Cincinnati, Ohio
45268

Dear Mr. Thompson, Ms. McPeck, and Mr. Renninger:

**Re: Progress Report: November 1 through 30, 2020
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [U.S. EPA] Docket No. V-W-16-C-011) effective June 11, 2016 (RI/FS ASAOC), and the ASAOC for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 U.S. EPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAOC), for the period of November 1 through 30, 2020.

The next Progress Report for the month of December 2020 will be submitted on or before January 10, 2021.



Significant Developments in this Reporting Period

RI/FS ASAOC Developments

Activities conducted in November 2020 are summarized below:

- The following soil gas investigation activities were completed:
 - The laboratory results for soil gas samples collected for TO-15 analysis in September/October 2020 were received from the laboratory on November 10, 2020. Data validation was conducted by GHD.
- The following groundwater investigation activities were completed:
 - Groundwater samples were collected from 20 monitoring wells between November 3, 2020 and November 11, 2020 as follows.
 - MW-203, MW-209, MW-210 on November 3, 2020
 - MW-210A, MW-215B, MW-216 on November 4, 2020
 - MW-217, MW-219, MW-227 on November 5, 2020
 - MW-229, MW-236, MW-238 on November 6, 2020
 - MW-237A, MW-239, MW-241 on November 9, 2020
 - MW-101A, MW-204, MW-233 on November 10, 2020
 - MW-235, MW-240 on November 11, 2020
 - Twenty groundwater samples (plus two field duplicates, two MS/MSD, two rinse blanks, five equipment blanks, seven field blanks, and seven trip blanks) were collected from 20 monitoring wells and submitted to Eurofins for laboratory analysis of volatile organic compounds (VOCs) (including 1,2-Dibromo-3-chloropropane and 1,2-Dibromoethane), semi-volatile organic compounds (SVOCs), metals (total and dissolved) and cyanide, major anions (chloride, sulfate, nitrite, nitrate), 1,4-dioxane, and per- and polyfluoroalkyl substances (PFAS).
 - Eight monitoring wells (MW-102, MW-103, MW-206, MW-207, MW-218A, MW-218B, MW-234, and MW-248) that were initially sampled on October 22/23 were resampled for 1,4-dioxane on November 2, 2020, due to an oversight regarding sample container requirements. Eight groundwater samples (plus one field duplicate, and one MS/MSD) were collected and submitted to Eurofins for laboratory analysis of 1,4-dioxane.
 - U.S. EPA oversight contractor Jacobs collected split samples for PFAS analysis at 15 monitoring well locations including:
 - MW-203, MW-209, MW-210 on November 3, 2020
 - MW-210A, MW-215B, MW-216 on November 4, 2020
 - MW-217, MW-219, MW-227 on November 5, 2020
 - MW-229, MW-236, MW-238 on November 6, 2020
 - MW-237A, MW-239, MW-241 on November 9, 2020



- One monitoring well (MW-201) was repaired on November 23, 2020. The stick-up casing was replaced with a flush-mount cover.
- On November 23, 2020, surveying was completed to update location coordinates and elevations for 32 monitoring wells, 4 gas probes and 3 surface water staff gauges.
- On November 23, 2020, GHD submitted a letter to U.S. EPA (via e-mail) including responses to the U.S. EPA comment letter dated October 21, 2020 and provided an updated draft Quality Assurance Project Plan (QAPP).
- On November 25, 2020, GHD provided information to the agencies (via e-mail) regarding proposed off-site disposal of investigation derived waste (IDW) including non-hazardous soil from monitoring well installation activities stored in an on-site roll-off container (20 cubic yards). GHD proposed to use Waste Management – Stony Hollow Landfill located at 2460 South Gettysburg Avenue, Dayton, Ohio. On November 25, 2020, U.S. EPA responded by indicating that the Waste Management facility was not currently approved but undergoing review.

Removal Action ASAOC Developments

Activities conducted in November 2020 are summarized below:

- On November 12, 2020, GHD was notified by the office of Mr. Mark Fornes (as property owner representative) of the new ownership contacts for the Dryden Road business properties sold in November 2020.
- On November 24, 2020, GHD submitted a letter to U.S. EPA (via email) including responses to the U.S. EPA comment letter dated April 8, 2020.

Summaries of all Anticipated Problems and Planned Resolutions

No difficulties/delays were encountered during this reporting period. However, the COVID-19 pandemic and requirements for physical/social distancing, isolation, and quarantine could cause future temporary or long-term equipment, supply and/or personnel availability issues that could affect the project schedule. Federal, state and local orders, as well as guidance from the Centers for Disease Control and Prevention, will be reviewed and followed before any field work or in-person meetings are conducted. We will keep U.S. EPA informed of any potential issues as the COVID-19 pandemic continues to develop and change.

Projected Work for the Next Reporting Period

- GHD will continue planning and scheduling RI/FS activities in accordance with the approved work plan. The planned activities include:
 - Continue discussions with property owners in order to complete field activities related to monitoring well installation and soil gas probe installation.
 - Review U.S. EPA comments dated April 4 (related to soil/fill and soil gas investigation), August 11 (related to the RAAD), and September 9 (related to the Quarry Pond investigation).



- Continue groundwater sampling activities including well development and groundwater sample collection from MW-201, repaired in November 2020.
- Coordinate off-site disposal of IDW including non-hazardous wastewater stored in the on-site frac tank.
- The Respondents and U.S. EPA On-Scene Coordinator will continue to work together to implement the VI mitigation work plan. The planned activities include:
 - Complete quarterly SSDS inspections at buildings with an operating system, including Buildings 8 and 9 – B&G Equipment and Truck Repair, Building 12 – Overstreet Painting and S&J Precision, Building 14 – NexGen Vending, Building 15 – SIM Trainer, Building 17 – D. Dickinson Construction (formerly Megacity Construction), and Building 24 – Globe Manufacturing.

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD

A handwritten signature in blue ink that reads "Julian Hayward". The signature is written in a cursive, flowing style.

Julian Hayward

JH/kf/6

cc: (all by pdf) Ken Brown, ITW
Bryan Heath, NCR
Wendell Barner, Barner Consulting
Jim Campbell, EMI
Andrew Dorn, ITW
Scott Blackhurst, Kelsey Hayes Company
Michael Hughes, Neal, Gerber & Eisenberg
Wray Blattner, Thompson Hine
Larry Silver, Langsam Stevens Silver & Hollaender

Tim Hoffman, Dinsmore & Shohl
Sally Scott, Jacobs
Valerie Chan, GHD